

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION

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BABY DOE, A CITIZEN OF AFGHANISTAN :
CURRENTLY RESIDING IN NORTH :
CAROLINA, BY AND THROUGH NEXT :
FRIENDS, JOHN AND JANE DOE; AND JOHN :
AND JANE DOE, CITIZENS OF AFGHANISTAN:
AND LEGAL GUARDIANS OF BABY DOE, :
: Plaintiffs, :
: :
v. :
: :
JOSHUA MAST, STEPHANIE MAST, RICHARD :
MAST, KIMBERLEY MOTLEY, AND AHMAD :
OSMANI, :
: Defendants, :
: and :
: :
UNITED STATES SECRETARY OF STATE :
ANTONY BLINKEN AND UNITED STATES :
SECRETARY OF DEFENSE GENERAL :
LLOYD AUSTIN, :
: Nominal Defendants. :
----- X

**[PROPOSED] ORDER GRANTING PLAINTIFFS' MOTION FOR LEAVE TO SEAL
PROPOSED RESPONSE IN OPPOSITION TO DEFENDANT RICHARD MAST'S
RESPONSE IN SUPPORT OF MOTION TO STAY DISCOVERY AND SUR-REPLY IN
SUPPORT OF DEFENDANTS JOSHUA MAST AND STEPHANIE MAST'S MOTION
TO STAY DISCOVERY, AND EXHIBIT 1 THERETO**

Having considered Plaintiffs' Motion, and Memorandum of Law in Support of Motion, to
their proposed Response in Opposition to Defendant Richard Mast's Response in Support of
Motion to Stay Discovery and Sur-Reply in Opposition to Defendants Joshua Mast and

Stephanie Mast's Motion to Stay Discovery ("Sur-Reply"), pursuant to Local Civil Rule 9, and for good cause shown, and the requirements of Local Civil Rule 9(b), and the decisions in *Ashcraft v. Conoco, Inc.*, 218 F.3d 288 (4th Cir. 2000), *In re Knight Publishing Co.*, 743 F.2d 231 (4th Cir. 1984), and *Stone v. Univ. of Maryland*, 855 F.2d 178 (4th Cir. 1988) having been met, it is hereby ORDERED that Plaintiff's Motion is granted. It is further ORDERED that the Sur-Reply and Exhibit 1 thereto are filed under seal.

Entered this ____ day of _____, 2023.

Judge